

Federal Defenders
OF NEW YORK, INC.

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August 7, 2025

Via ECF

The Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Request granted. So Ordered.



Robert W. Lehrburger, USMJ
August 7, 2025

Re: United States v. Mario Pineiro
25 Mag. 1812 (UA)

Dear Judge Lehrburger,

I write with the consent of Pretrial Services and the Government to respectfully request a modification of Mr. Pineiro's pretrial release conditions in the above-captioned matter. Mr. Pineiro was arrested and released on May 29, 2025, subject to, *inter alia*, the condition that he have no access to any internet-enabled devices unless in the presence of defense counsel. *See* Doc. 4. Given Mr. Pineiro's general compliance with the conditions of his release to date, we respectfully request that the Court modify Mr. Pineiro's bond to remove the condition that he have no access to any internet-enabled devices and replace it with the following:

1. The defendant's internet use is restricted to one computer device approved by Pretrial Services;
2. The defendant must allow Pretrial Services to assess, configure, manage, and/or install monitoring software on the approved computer device;
3. The defendant's use of the computer device is restricted to phone calls, text messages, emails, and Google Maps; and
4. The defendant is not to possess or access any internet-capable devices (outside the presence of defense counsel or staff) until an appropriate device is delivered to, approved by, and configured by Pretrial Services.

The defense is requesting this modification to support Mr. Pineiro's efforts to apply for employment and respond to work-related communications. Under the current condition, Mr. Pineiro needs to travel to counsel's office any time he wishes to apply for employment online and/or respond to work-related electronic correspondence. Pretrial Services and the Government do not object to the proposed modification.

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We thank the Court for its consideration.

Respectfully submitted,

/s/

Neil P. Kelly
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cc: Pretrial Services Officer Jonathan Lettieri
AUSA Kevin Grossinger